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The Association of Woodworking and Furnishings Suppliers® (AWFS®) is a California based trade association of manufacturers and distributors of machinery, hardware, lumber, upholstery materials, bedding components, wood products and other supplies to furnishings, cabinet and other wood product manufacturers.

Phase II standard to be implemented in 2011 for most products that is not commercially feasible for the wood product industry. (P2 levels are being achieved today, but for niche applications at a premium cost/price)

We are not opposed to a workable standard and the Wood Industry Coalition has proposed a workable standard.

CARB staff has not effectively addressed how finished products manufactured overseas and shipped into the state will be inspected and enforced.

California and other domestic wood product manufacturers will spend time and money trying to comply with the regulation, or go out of business trying. The added costs of compliance will affect every business in the wood products supply chain, including machinery companies and fabric and filling companies.

While CARB staff believes the regulation is economically feasible for the industry, it appears the economic analysis does not take into account the added costs to California business of trying to compete against non-compliant, cheaper products from overseas. That will still make their way into the market place.

The problems with enforcement will benefit imported goods and their suppliers -- further jeopardizing jobs in California. There are thousands of California based small businesses engaged in cabinet making -- all of whom are buying machinery and equipment from AWFS® companies. If these cabinet makers cannot compete with finished products from overseas, then they will go out of business and

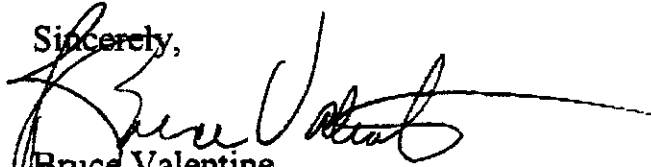
our companies will no longer have customers who can buy new machinery and hardware.

And of course without customers, the AWFS® companies will have no reason to hire the thousands of young people who graduate from industry sponsored Career and Technical Education programs in our public high schools and community colleges.

Again, the Wood Industry Coalition as you are aware, can make the Phase I standards work. With an adjustment, the Phase II standards can work.

On behalf of AWFS® we would ask that you adopt the Phase II standards presented by the Wood Industry Coalition.

Sincerely,



Bruce Valentine
AWFS® Director of Communications